

Exhibit B

From: [LeRae Karn](#)
To: [Schaefer, Michelle](#); [Jillian Scherrer](#); [Butch Boyd](#); [Barach, Kate](#)
Cc: [Collesano, Anne](#); [Katrina Boyd](#)
Subject: Re: FTC's Witness List, Exhibit List, and Deposition Designations
Date: Friday, November 10, 2023 12:37:28 AM

Dear All,

Please see Defendants' witness list, exhibit list and designation of deposition testimony:

Defendants intend and may call some or all of the following witnesses at the time of trial, if the need arises:

Azim Makanojiya
Khalil Makanojiya
Rufus L. Jenkins
Butch Boyd
Jillian Scherrer

DEFENDANTS' TRIAL EXHIBITS

Zaappaaz_0000011

Zaappaaz_0000079

Zaappaaz_0000036 to Zaappaaz_0000037

COATES_0000144

Delivered 307 Orders.xlsx

PTX 1-Cause No. 4:20-CV-02717 Document 100—1 Filed on 10/26/2022

PTX 10-Cause No. 4:20-CV-02717 Document 100—10 Filed on 10/26/2022

PTX 100-Cause No. 4:20-CV-02717 Document 100—100 Filed on 10/26/2022

PTX 101-Cause No. 4:20-CV-02717 Document 100—101 Filed on 10/26/2022

PTX 102-Cause No. 4:20-CV-02717 Document 100—102 Filed on 10/26/2022

PTX 103-Cause No. 4:20-CV-02717 Document 100—103 Filed on 10/26/2022

PTX 104-Cause No. 4:20-CV-02717 Document 100—104 Filed on 10/26/2022

PTX 106-Cause No. 4:20-CV-02717 Document 100—106 Filed on 10/26/2022

PTX 107-Cause No. 4:20-CV-02717 Document 100—107 Filed on 10/26/2022

PTX 114-Cause No. 4:20-CV-02717 Document 100—114 Filed on 10/26/2022

PTX 13-Cause No. 4:20-CV-02717 Document 100—13 Filed on 10/26/2022

PTX 14-Cause No. 4:20-CV-02717 Document 100—14 Filed on 10/26/2022

PTX 15-Cause No. 4:20-CV-02717 Document 100—15 Filed on 10/26/2022

PTX 17-Cause No. 4:20-CV-02717 Document 100—17 Filed on 10/26/2022

PTX 18-Cause No. 4:20-CV-02717 Document 100—18 Filed on 10/26/2022

PTX 19-Cause No. 4:20-CV-02717 Document 100—19 Filed on 10/26/2022

PTX 2-Cause No. 4:20-CV-02717 Document 100—2 Filed on 10/26/2022

PTX 20-Cause No. 4:20-CV-02717 Document 100—20 Filed on 10/26/2022

PTX21- April 23, 2021 Stripe Refund Information Stripe_000001(1).xlsx

PTX 26-Cause No. 4:20-CV-02717 Document 100—26 Filed on 10/26/2022

PTX 28-Cause No. 4:20-CV-02717 Document 100—28 Filed on 10/26/2022

PTX 35-Cause No. 4:20-CV-02717 Document 100—35 Filed on 10/26/2022

PTX 36-Cause No. 4:20-CV-02717 Document 100—36 Filed on 10/26/2022
PTX 38-Cause No. 4:20-CV-02717 Document 100—38 Filed on 10/26/2022
PTX 39-Cause No. 4:20-CV-02717 Document 100—39 Filed on 10/26/2022
PTX 4-Cause No. 4:20-CV-02717 Document 100—4 Filed on 10/26/2022
PTX 41-Cause No. 4:20-CV-02717 Document 100—41 Filed on 10/26/2022
PTX 48-Cause No. 4:20-CV-02717 Document 100—48 Filed on 10/26/2022
PTX49-2020 Chargeback Report(1).xlsx
PTX 5-Cause No. 4:20-CV-02717 Document 100—5 Filed on 10/26/2022
PTX 50-Cause No. 4:20-CV-02717 Document 100—50 Filed on 10/26/2022
PTX 52-Cause No. 4:20-CV-02717 Document 100—52 Filed on 10/26/2022
PTX54-March 13, 2022 Complaint Summary (1).xlsx
PTX 56-Cause No. 4:20-CV-02717 Document 100—56 Filed on 10/26/2022
PTX 57- Master Chart Zaappaaz 0020596 (1).xlsx
PTX 59-Cause No. 4:20-CV-02717 Document 100—59 Filed on 10/26/2022
PTX 60- DHL Shipment Records DHL0000005 (1). Xlsx
PTX 62- DHL Shipment Records FTC0004572 (1).xlsx FTC0004938
PTX65-USPIS Shipping and Delivery Information
PXT 66-Cause No. 4:20-CV-02717 Document 100—66 Filed on 10/26/2022
PTX 68-USP Tracking Information UPS_0000654 (1).xlsx
PXT 69-Cause No. 4:20-CV-02717 Document 100—69 Filed on 10/26/2022
PXT 74-Cause No. 4:20-CV-02717 Document 100—74 Filed on 10/26/2022
PXT 75-Cause No. 4:20-CV-02717 Document 100—75 Filed on 10/26/2022
PXT 76-Cause No. 4:20-CV-02717 Document 100—76 Filed on 10/26/2022
PXT 82-Cause No. 4:20-CV-02717 Document 100—82 Filed on 10/26/2022
PTX 84-Striple Refund Spreadsheet Zaappaaz 0020791 (1). Xlxs
PXT 85-Cause No. 4:20-CV-02717 Document 100—85 Filed on 10/26/2022
PTX86 FedEx Express Shipment and Delivery Information FedEx-Express_00093708
PTX87 FedEx Express Shipment and Delivery Information FTC0003086 (1)
PXT 88-Cause No. 4:20-CV-02717 Document 100—88 Filed on 10/26/2022
PTX89-FedEx Ground Pickup and Delivery Information Fedex-Ground_0001
PXT 90-Cause No. 4:20-CV-02717 Document 100—90 Filed on 10/26/2022
PTX91- FedEx Ground Pickup Information FTC0004654.xlxs
PXT92-Fed Ex Ground Trailer Pickup Dates FTC0004686.xlxs
PTX94-Fed Ex Freight Shipment and Delivery Information FTC0004707.xlxs
PTX95-FedEx Freight Shipment and Delivery Information FTC0004678 (1).xlxs
PTX96-Amazon Chargeback Transactions Amazon_0000002 (1).xlsx
PTX97-Amazon Chargeback Transactions Amazon_0000098 (1).xlsx
PXT 98-Cause No. 4:20-CV-02717 Document 100—98 Filed on 10/26/2022
PXT 99-Cause No. 4:20-CV-02717 Document 100—99 Filed on 10/26/2022
Zaappaaz Exhibit 2- Unsworn Declaration of Azim Makanojiya
Zaappaaz Exhibit 22
Zaappaaz Exhibit 40
Zaappaaz Exhibit 48
Zaappaaz Exhibit 50
Zaappaaz Exhibit 82
Zaappaaz_0020596 cs. PX 57 Master Chart Zaappaaz 0020596-Merged Diffs.xlxs

Zaappaaz_0020596.xlsx

Defendants' Page and Line Designations:

Deposition of Rufus Jenkins March 14, 2022
01:01-02:09
04:03-04:15
17:20 - 18:05
21:12 - 23:06
22:14-23:06
23:18 - 24:12
24:18 to 24:20
25:15 - 25:17
25:22 - 26:11
28:01-28:04
28:11-29:03
29:18-30:10
49:12-49:14; 49:18-50:08
52:21-54:13; 54:16
55:03-55:05; 55:09-55:12
57:21 to 59:05
60:01-60:16
68:03-69:15
70:06-70:16
71:17-71:20
72:07-72:14
73:02-73:15; 73:18; 73:21
74:01-74:02
74:08-74:10; 74:13
75:16-76:14; 76:17
79:10-79:14
79:17-79:20
80:16-81:03
84:01-84:02
84:05-84:14
98:03-98:22
99:10-99:16
109:02-109:05
110:03-110:08
110:13-110:14
114:08-114:11
115:19-116:04
116:09-117:01
117:06-117:09

120:13-120:16
124:05:124:08; 124:12
135:14-135:16
135:19-135:22
140:13-140:16
140:21-140:22
156:04-157:05
158:14-158:16
161:02-161:06
162:13-162:20
164:01-164:22

Deposition of Tracy Chapell June 11, 2022	
01:01-02:20	
5:18-06:03	
39:14-40:05	
40:18-40:22	
44:13-44:23	
45:14-45:19	
57:19-58:02	
60:20-61:19	
62:08-62:20	
63:18-63:21	
64:05-64:09	
70:01-70:20	

Deposition of David Muse August 10, 2022	
1:01-03:02	
07:06-07:20	
66:03-66:09	
76:23-76:25	
78:12-79:22	
84:22-85:09	
100:15-100:25	
101:18-101:22	
107:01-107:20	
101:13 -101:22	

Deposition of Floyd Smith	
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August 16, 2022
01:01-03:11
06:25-07:14
37:17-38:02
38:14-38:19
39:05-39:12; 39.14
39:24-40:05
41:11-41:25
43:01-43:20

Sincerely,
LeRae

LeRae Karn | Attorney

Butch Boyd Law Firm, P.C.

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From: Schaefer, Michelle <mschaefer@ftc.gov>

Sent: Thursday, November 9, 2023 2:09 PM

To: Jillian Scherrer <JillianScherrer@Butchboydlawfirm.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; LeRae Karn <LeraeKarn@Butchboydlawfirm.com>; Barach, Kate <kbarach@ftc.gov>

Cc: Collesano, Anne <acollesano@ftc.gov>

Subject: FTC's Witness List, Exhibit List, and Deposition Designations

Hi Jillian and Butch,

Pursuant to our agreement, below please find the FTC's exhibit list, witness list, and deposition designations:

Witness List:

1. Azim Makanojiya

Exhibit List:

1. ECF 1, FTC Complaint for Permanent Injunction and Other Equitable Relief
2. ECF 22, Stipulated Preliminary Injunction Order with Other Equitable Relief
3. ECF 29, Defendants' Answer to Complaint for Permanent Injunction and Other Relief, Affirmative Defenses and Jury Demand
4. ECF 108, Defendants' Response to Plaintiff's Motion for Summary Judgment, Motion for Leave to Extend Deadline for Response, and Motion to Exclude the Testimony of Rufus Jenkins
5. Defendant Azim Makanojiya's Objections and Responses to Plaintiff's First Set of Interrogatories, December 4, 2020
6. October 15, 2020 Email from Azim Makanojiya
7. Ionized Certificate of Formation, June 11, 2018
8. Ionized Certificate of Formation, Corrected, June 13, 2018
9. Ionized Public Information Report, February 16, 2023
10. Mak Solutions Public Information Report, February 19, 2022
11. Screenshot of customballoonnow.com homepage, November 9, 2023
12. Screenshot of custombuttonsnow.com homepage, November 9, 2023
13. Screenshot of customlanyard.net homepage, November 9, 2023
14. Screenshot of customtattoo.com homepage, November 9, 2023
15. Screenshot of Glow Universe homepage, November 9, 2023
16. Screenshot of Ionized LLC homepage (Azim hover), November 9, 2023
17. Screenshot of Ionized LL homepage (portfolio), November 9, 2023
18. Screenshot of IonizedLLC.com, November 9, 2023
19. Screenshot of stressballfactory.com homepage, November 9, 2023
20. Screenshot of Wrist-band.com homepage, November 9, 2023
21. Screenshot of Wristbandtoday.com homepage, November 9, 2023

Deposition Designations:

1. August 11, 2021 Azim Makanojiya/Zaappaaz 30(b)(6) Dep Transcript:
 - a. 16:12-17:12
 - b. 29:1-30:12
 - c. 31:18-33:3
 - d. 60:1-17
 - e. 99:22-100:15
 - f. 107:25-108:18
 - g. 169:7-20

2. August 12, 2021 Azim Makanojiya/Zaappaaz 30(b)(6) Dep Transcript:
 - a. 263:8-264:20
 - b. 280:20-281:22
 - c. 471:13-472:4

We look forward to receiving your lists and designations:

Thank you,

Michelle Schaefer

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